

## Comments on CBRS NPRM

Verso Networks/WiFiHood is a Wireless ISP serving the Denver metro area by providing competitive broadband Internet service to single-family residential, multi-family residential, and small business customers. We deliver speeds from 25 Mbps up to 500 Mbps to 1,500 customers and we are growing quickly. We are developing a very loyal and supportive customer base that prefers a local ISP instead of the big carriers because we deliver better value and a superior customer experience.

We have been closely following the developments with the CBRS band because it is a solution to our capacity and reliability problems with point-to-multipoint fixed wireless service. The 5GHz unlicensed band is overused and increasingly unreliable so we need to transition to better spectrum. We have recently obtained a license for the 3650-3700 MHz band and are deploying service with very good results. We plan to purchase a significant amount of equipment that works for the 3550-3700 MHz bands in anticipation of favorable CBRS rules. The CBRS band will enable us to provide high quality service with speeds in the 100-500 Mbps range.

We oppose the proposals to increase the geographic size of PALs to PEAs or lengthen the license terms to ten years because they cater to the national mobile carriers at the expense of smaller service providers. These proposals make it economically infeasible for small companies to make competitive bids at the PAL auction and thus PALs would become almost exclusively the domain of the national mobile carriers. The FCC should not be picking winners and losers but instead let consumers decide who prevails. The CBRS band was conceived as an 'innovation band' that supported a variety of new methods and applications, not just another band for national mobile carriers to use for '5G'. The 'C' in CBRS stands for Citizens, not Carriers. We believe that the most innovative and productive uses of the CBRS band will come from smaller companies, not the national mobile carriers. Small companies will deploy those innovative solutions more quickly and cost-effectively in their markets to benefit consumers. The CBRS rules for PALs should remain as originally designed using census tracts and a 3 year term.

Sincerely,  
William Fowler  
President  
Verso Networks